

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
ex rel. John King and Jane Doe, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
vs.	§	CIVIL ACTION NO. 06-2662
	§	
SOLVAY S.A., et al.,	§	
	§	
<i>Defendants.</i>	§	

**DEFENDANT SOLVAY PHARMACEUTICALS, INC.'S
RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT
ON RELATORS' P&T-COMMITTEE-INFLUENCE THEORY**

Pursuant to Federal Rule of Civil Procedure 56, Defendant Solvay Pharmaceuticals, Inc. (“SPI”) hereby moves for partial summary judgment on claims made by John King and Tammy Drummond (collectively, “Relators”) against SPI in Relators’ Fifth Amended Complaint. The bases for partial summary judgment on Relators’ P&T-Committee-Influence theory are, as detailed in the accompanying memorandum of law, that there are no genuine issues of material fact and SPI is entitled to judgment as a matter of law.

Pursuant to L.R.7.5, SPI requests oral argument on this motion.

Dated: October 7, 2014

Respectfully submitted,

ABBVIE PRODUCTS, LLC, f/k/a
SOLVAY PHARMACEUTICAL, INC.

By its Attorneys,
HOGAN LOVELLS US LLP

/s/ Bruce D. Oakley

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CERTIFICATE OF SERVICE

On the 7th day of October 2014, a copy of Defendant Solvay Pharmaceuticals, Inc.s' Renewed Motion for Partial Summary Judgment on Relators' P&T-Committee-Influence Theory was filed electronically using the Court's Electronic Case Filing System. Notice of this filing will be sent electronically to counsel of record using the Court's electronic notification system. Parties may access this filing through the Court's Electronic Case Filing System.

s/ Bruce D. Oakley
Bruce D. Oakley